



PORT OF OAKLAND

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Hon. Sunne Wright McPeak
Secretary
Business, Transportation and Housing Agency
980 9th Street, Suite 2450
Sacramento, CA 95814

Dr. Alan Lloyd
Secretary
Environmental Protection Agency
1001 I Street
Sacramento, CA 95814

RE: Goods Movement Action Plan: Response to Phase II Draft

Dear Secretary McPeak and Secretary Lloyd:

On behalf of the Port of Oakland, I appreciate the opportunity to comment on the Goods Movement Action Plan (GMAP) Phase II draft. However, before enumerating our comments, I need to express the Port's disappointment that this goods movement plan appears not to be a part of the Strategic Growth Plan that the Governor outlined in his State-of-the-State address last week. After hearing for months that goods movement infrastructure revitalization is to be a high priority for the state, we saw virtually no mention of goods movement in the outline of the strategic plan. A tremendous amount of effort has gone into identifying the magnitude of California's goods movement system and to making GMAP a blueprint for improving that system. Please validate our efforts to build a strong statewide goods movement system and make GMAP a significant component of California's Strategic Growth Plan.

The Port's comments, following, are intended to assist your staffs in strengthening this plan as a tool to improving the goods movement system throughout the state.

The Guiding Principles

1. It is important to maintain the **simultaneous** approaches to improvement in infrastructure and to mitigation. We agree that while mitigation must be addressed, such attention cannot come at the expense of infrastructure improvement.
 - a. Section III, number 8 states that land use implications need to be considered in goods movement decisions. We recommend that the resource materials listed under this point consider industrial, port and transportation-related land uses in formulating this interrelationship as opposed to residential/urban infill land uses that are most frequently cited.

2. The plan makes repeated reference to issues and projects particular to Southern California. An overwhelming share of identified funding for the key improvements is directed to projects benefiting the Ports of Los Angeles and Long Beach. While improvements to the infrastructure in Southern California are clearly needed, the plan needs to keep sight of the principle that all of the identified corridors comprise one, single **statewide system**. We urge the state to focus our resources on improving the system as a whole.

Use of Metrics

1. In Section III, under Metrics for Public Health and Environmental Impact Mitigation, a number of total quantities of emissions are listed. It might be more meaningful in measuring improvement to evaluate quantity of emissions per unit of equipment, such as per yard locomotive or per yard truck or crane.
2. Just looking at total container throughput numbers (Table III-1) does not enable us to evaluate progress made as physical improvements or operational efficiencies allow a **relative improvement** such as a certain percentage increase in throughput or a reduction in emissions.
3. In Section VI, there are tables that appear to evaluate projects and practices by a series of criteria or metrics. If these matrices are going to be used in the evaluation of projects and programs, then we strongly suggest that they be subjected to further discussion and analysis, so that accuracy and completeness may be improved.

Funding Sources

The Port continues to vigorously oppose container fees, unless they are required on a national basis. Our primary reasons for this position are:

- California agricultural exporters, who primarily ship out of Oakland cannot afford further erosion of their already narrow margin.
- Oakland does not command a large enough volume of local cargo to keep ocean carriers from diverting to less-expensive out-of-state ports.
- There is bound to be a lengthy legal battle over imposition of such a fee that would create an uncertainty among shippers and carriers that would discourage growth of cargo at Oakland.

Glossary

The number of references to the Ports of Los Angeles and Long Beach and to aspects that pertain distinctly to those ports, such as the definitions given of Near-Dock Rail Yard or Transload Facility make this look more like a Southern California ports-related document than a true statewide plan. We strongly suggest that some definitions be reworked in order to be more inclusive. For example:

- Near-dock rail yards are those that are located near marine terminals. They can be on or off port property. In the case of Oakland, our near-dock rail facilities are physically closer to marine terminal wharves than some ports' on-dock rail facilities.
- Transload facilities can process export cargo as well as import cargo. In Oakland, most of our transloaders from rail to container deal predominantly with export loads.

Infrastructure Project Lists

We have a few specific corrections and comments to make on this section.

1. On the Detailed Infrastructure Projects List, for the column, Regional Environmental Impact, there needs to be a key to explain the symbols used.
2. In the Bay Area Corridor section of the same table, the Reconstruction of 7th Street/Union Pacific Grade Separation has an additional significant primary impact which is public access.
3. On the Additional Projects for Consideration list, the Outer Harbor Intermodal Terminal should be deleted since it is already identified as a Key Project.
4. On the same list, the CIRIS project cost was changed some time ago to \$20 million, to reflect a more detailed scoping of infrastructure development.
5. The Port's Access Tracks to Intermodal Facilities for \$12 million, which was bumped from the Key Project list to make room for the Outer Harbor Intermodal Terminal, should be added to this list, as it is still a priority and is needed if the Port's intermodal rail terminals are to be able to increase capacity.

Thank you for providing the Port the opportunity to comment on this plan. Please feel free to contact me with further questions.

Sincerely,



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